

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -

5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :

8 : CASE NO.
9 THIS DOCUMENT : 1:17-MD-2804
10 RELATES TO ALL CASES:

11 : Hon. Dan A.
12 : Polster
13 - - -

14 Thursday, January 24, 2019
15 - - -

16 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
17 CONFIDENTIALITY REVIEW
18 - - -

19 Videotaped deposition of
20 LARRY RINGGOLD, taken pursuant to notice,
21 was held at Homewood Suites by Hilton
22 4170 Philadelphia Road, Bel Air, Maryland
23 21015, beginning at 5:01 p.m., on the
24 above date, before Amanda Dee
Maslynsky-Miller, a Certified Realtime
Reporter.

25 - - -
26 GOLKOW LITIGATION SERVICES
27 877.370.3377 ph | 917.591.5672 fax
28 deps@golkow.com
29 - - -

Page 2		Page 4
1 APPEARANCES:		1
2		2 - - -
3 BARON & BUDD, P.C.		3 I N D E X
4 BY: WILLIAM POWERS, ESQUIRE		4 - - -
EMMA KABOLI, PARALEGAL		
600 New Hampshire Avenue NW		
5 Suite 10A		
Washington, DC 20037		
6 Wpowers@baronbudd.com		6 By Mr. Powers 8
Ekaboli@baronbudd.com		7 By Mr. Lavelle 107
7 Representing the Plaintiffs		8 - - -
9		9 E X H I B I T S
10 MORGAN, LEWIS & BOCKIUS LLP		10
11 BY: JOHN P. LAVELLE, JR., ESQUIRE		11 NO. DESCRIPTION PAGE
12 1701 Market Street		12 Rite Aid-Ringgold Exhibit-1 Rite_Aid_OMDL_0049982-993 39
13 Philadelphia, Pennsylvania 19103		13 Rite Aid-Ringgold
(215) 963-4824		14 Exhibit-2 Rite_Aid_OMDL_0032421 46
12 John.lavelle@morganlewis.com		15 Rite Aid-Ringgold
- and -		16 Exhibit-3 Rite_Aid_OMDL_0032422 46
14 BY: MATTHEW R. LADD, ESQUIRE		17 Rite Aid-Ringgold
15 101 Park Avenue		18 Exhibit-4 Rite_Aid_OMDL_0027551-552 57
16 New York, New York 10178		19 Rite Aid-Ringgold
(212) 309-6141		20 Exhibit-5 Rite_Aid_OMDL_21461-463 64
16 Matthew.ladd@morganlewis.com		21 Rite Aid-Ringgold
Representing the Defendant,		22 Exhibit-7 Rite_Aid_OMDL_0012020-021 79
Rite Aid		23 Rite Aid-Ringgold
24		24 Exhibit-8 Rite_Aid_OMDL_0011115-116 90
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1 APPEARANCES: (Continued)		1
2 VIA TELEPHONE/LIVESTREAM:		2 - - -
3		3 E X H I B I T S
4 GIBBONS PC		4
5 BY: PAUL E. ASFENDIS, ESQUIRE		5 NO. DESCRIPTION PAGE
One Pennsylvania Plaza		5 Rite Aid-Ringgold
37th Floor		6 Exhibit-9 Rite_Aid_OMDL_0003108-109 95
6 New York, New York 10119		7 Rite Aid-Ringgold
(212) 613-2000		7 Exhibit-10 Rite_Aid_OMDL_0010795-796 100
7 Pasfendis@gibbonslaw.com		8 Rite Aid-Ringgold
Representing the Defendant,		8 Exhibit-11 Rite_Aid_OMDL_0003562 111
AmerisourceBergen Corporation		9
10 JONES DAY		10
11 BY: JASON Z. ZHOU, ESQUIRE		11
77 West Wacker		12
12 Chicago, Illinois 60601		13
(312) 782-3939		14
13 Jzhou@jonesday.com		15
Representing the Defendant,		16
Walmart		17
15		18
16 ARNOLD & PORTER KAYE SCHOLER LLP		19
17 BY: JOHN D. LOMBARDO, ESQUIRE		20
44th Floor		21
18 777 South Figueroa Street		22
Los Angeles, California 90017		23
(213) 243-4000		24
John.lombardo@arnoldporter.com		
Representing the Defendant,		
Endo Pharmaceuticals, Endo Health,		
and Par Pharmaceuticals		
22		
23 ALSO PRESENT:		
Dan Lawlor, Videographer		
24 Jeff Sayres, Trial Technician		

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1 - - - 2 DEPOSITION SUPPORT INDEX 3 - - - 4 5 Direction to Witness Not to Answer 6 Page Line Page Line Page Line 7 None 8 9 10 Request for Production of Documents 11 Page Line Page Line Page Line 12 None 13 14 15 Stipulations 16 Page Line Page Line Page Line 17 7 1 18 19 20 Question Marked 21 Page Line Page Line Page Line 22 None 23 24	1 on the stenographic record. The 2 court reporter is Amanda Miller 3 and will now swear in the witness. 4 5 - - - 6 LARRY RINGGOLD, after having 7 been duly sworn, was examined and 8 testified as follows: 9 10 - - - 11 EXAMINATION 12 - - - 13 BY MR. POWERS: 14 Q. Good evening, Mr. Ringgold. 15 My name is Will Powers, and I represent 16 the plaintiffs in this litigation. 17 Before we get started, can 18 you please just state your full name and 19 spell it for the record? 20 A. Larry Ringgold, Junior, 21 L-A-R-R-Y, R-I-N-G-G-O-L-D. 22 Q. And we're here for your 23 deposition today. 24 Do you understand that? 25 A. Yes. 26 Q. Have you ever been deposed
1 - - - 2 (It is hereby stipulated and 3 agreed by and among counsel that 4 sealing, filing and certification 5 are waived; and that all 6 objections, except as to the form 7 of the question, will be reserved 8 until the time of trial.) 9 - - - 10 VIDEO TECHNICIAN: We are 11 now on the record. My name Ray 12 Moore, I'm a videographer for 13 Golkow Litigation Services. 14 Today's date is January 24, 2019, 15 and the time is 5:01 p.m. 16 This video deposition is 17 being held in Bel Air, Maryland, 18 in the matter In Re National 19 Prescription Opiate Litigation for 20 the United States District Court 21 for the Northern District of Ohio, 22 Eastern Division, MDL Number 2804. 23 The deponent is Larry 24 Ringgold. Counsel will be noted	1 before? 2 A. No. 3 Q. I want to just go over a 4 couple of ground rules before we get 5 started to make sure we're all on the 6 same page. 7 Because the court reporter 8 is writing down what is being said, it's 9 important that only one of us is speaking 10 at a time. So even if you think you know 11 where I'm going with a question, please 12 don't jump in. We want to make sure I 13 finish my question before you answer -- 14 give your answer, and I'll let you give 15 your answer before I ask the question. 16 Is that okay? 17 A. Yes. 18 Q. And also, when you're 19 answering my questions, I need verbal 20 answers; so no nods of the head, shrugs 21 of the shoulders, uh-huh or uh-uh, stuff 22 like that. 23 Is that all right? 24 A. That's all right.
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Page 10	Page 12
<p>1 Q. And if for any reason you 2 don't understand a question or it 3 requires some sort of clarification, you 4 have to tell me, and we can get that 5 matter resolved before you answer the 6 question.</p> <p>7 Is that okay?</p> <p>8 A. Yes.</p> <p>9 Q. So I'll assume, then, if you 10 answer a question, you understand my 11 question.</p> <p>12 Is that all right?</p> <p>13 A. Yes.</p> <p>14 Q. Are you currently suffering 15 from any medical diseases or illnesses 16 that in any way interfere with your 17 ability to answer truthfully and 18 completely my questions here tonight?</p> <p>19 A. No.</p> <p>20 Q. And I just ask that you keep 21 your voice up a little bit, because 22 everything is being recorded as well, 23 okay?</p> <p>24 A. Yes.</p>	<p>1 you need them. But if you have a 2 question pending while -- I need you to 3 answer that question before we take the 4 break.</p> <p>5 Is that okay?</p> <p>6 A. Yes.</p> <p>7 MR. LAVELLE: The witness 8 reserves the right to consult with 9 counsel on issues of privilege.</p> <p>10 BY MR. POWERS:</p> <p>11 Q. Okay, Mr. Ringgold. I want 12 to start with your educational 13 background.</p> <p>14 Did you complete high 15 school?</p> <p>16 A. Yes.</p> <p>17 Q. Where did you complete high 18 school?</p> <p>19 A. Aberdeen Senior High School.</p> <p>20 Q. And what year was that?</p> <p>21 A. 1985.</p> <p>22 Q. Any education beyond high 23 school?</p> <p>24 A. Yes.</p>
<p>1 Q. Are you currently taking any 2 medication or drugs that may in any way 3 interfere with your ability to answer my 4 questions truthfully and completely?</p> <p>5 A. No.</p> <p>6 Q. And do you understand the 7 court reporter has sworn you in and 8 you're under oath here today just as you 9 would be in a courtroom at trial?</p> <p>10 A. Yes.</p> <p>11 Q. And because you are under 12 oath, if you lie or provide intentionally 13 misleading answers, you may be subject to 14 criminal or civil penalties.</p> <p>15 Do you understand that?</p> <p>16 A. Yes.</p> <p>17 Q. And your counsel may, from 18 time to time, object. But I'm still 19 entitled to answer to my question, unless 20 your counsel specifically instructs you 21 not to answer.</p> <p>22 Do you understand that?</p> <p>23 A. Yes.</p> <p>24 Q. And we can take breaks when</p>	<p>1 Q. What education do you have 2 beyond high school?</p> <p>3 A. Some years at Bowie State 4 University.</p> <p>5 Q. And that's spelled 6 B-O-W-I-E, right?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Did you get a degree from 9 Bowie State?</p> <p>10 A. I didn't finish, no.</p> <p>11 Q. Did you ever complete a 12 college degree?</p> <p>13 A. No.</p> <p>14 Q. Besides your years at Bowie 15 State, any other education beyond high 16 school?</p> <p>17 A. Just military, military 18 stuff.</p> <p>19 Q. When were you in the 20 military?</p> <p>21 A. From 1990 to 1998.</p> <p>22 Q. What did you do after you 23 left the military in 1998?</p> <p>24 A. I think I worked at, in</p>

<p style="text-align: right;">Page 14</p> <p>1 19 -- when I got out -- I think while I 2 was still in, I was still working, it was 3 the Army National Guard. So I worked at 4 The Gap.</p> <p>5 Q. So just to be clear, when 6 you're in the military, you were with the 7 Army National Guard?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And you also had employment 10 at The Gap while you were concurrently 11 employed with the Army National Guard?</p> <p>12 A. Yes.</p> <p>13 Q. And you said you had some 14 education while you were in the military. 15 What was the nature of that 16 education?</p> <p>17 A. I worked on the Arcola 18 helicopter weapon systems. So they would 19 send us out to different schools, and we 20 would do different things in Texas to 21 kind of keep us up to speed on different 22 electronics and troubleshooting the 23 aircraft.</p> <p>24 Q. Any other education that we</p>	<p style="text-align: right;">Page 16</p> <p>1 that would be?</p> <p>2 A. I'm just thinking, I mean, 3 just general stuff with the job. They 4 would send us on little stuff. I can't 5 really recall at the moment.</p> <p>6 Q. Any education on controlled 7 substances?</p> <p>8 A. Education on controlled 9 substances? The only thing we did do a 10 DEA -- like a little thing they sent us 11 to, I think it was Fort Lauderdale once.</p> <p>12 Q. And who is "they"?</p> <p>13 A. The job.</p> <p>14 Q. When you say "the job," you 15 mean your job at --</p> <p>16 A. Rite Aid.</p> <p>17 Q. -- Rite Aid?</p> <p>18 MR. LAVELLE: And just wait 19 until the question is finished 20 before you answer the question.</p> <p>21 THE WITNESS: Yes, sir.</p> <p>22 BY MR. POWERS:</p> <p>23 Q. So besides what you just 24 talked about there when you were with</p>
<p style="text-align: right;">Page 15</p> <p>1 have not talked about yet?</p> <p>2 A. Not that I can recall. I 3 have some other stuff that I'm missing, 4 but that's basically it.</p> <p>5 MR. LOMBARDO: Apologies for 6 the interruption. The telephone 7 is not picking up the witness's 8 testimony. Is there a mic near 9 the witness?</p> <p>10 - - -</p> <p>11 (Whereupon, a discussion off 12 the record occurred.)</p> <p>13 - - -</p> <p>14 BY MR. POWERS:</p> <p>15 Q. So, Mr. Ringgold, as you 16 just heard, I think we both have to just 17 keep our voices up a little bit so 18 everyone on the phone can hear.</p> <p>19 Is that okay?</p> <p>20 A. Yes.</p> <p>21 Q. You said that there might 22 be -- might be some other education that 23 you might be missing.</p> <p>24 Do you have any idea what</p>	<p style="text-align: right;">Page 17</p> <p>1 Rite Aid, any other education about 2 controlled substances prior to joining 3 Rite Aid?</p> <p>4 A. No.</p> <p>5 Q. And when did you join Rite 6 Aid?</p> <p>7 A. September of 2000.</p> <p>8 Q. And you mentioned previously 9 there that they, meaning Rite Aid, sent 10 you to Fort Lauderdale once.</p> <p>11 When was that?</p> <p>12 A. I don't remember. It was a 13 long time ago.</p> <p>14 Q. More than ten years ago?</p> <p>15 A. Possibly.</p> <p>16 Q. And why did Rite Aid send 17 you to Fort Lauderdale?</p> <p>18 A. It was a DEA conference.</p> <p>19 Just to get the experience of being 20 around some of the DEA and things like 21 that.</p> <p>22 Q. Did anyone else go with you 23 to this conference from Rite Aid?</p> <p>24 A. They meaning who?</p>

<p style="text-align: right;">Page 18</p> <p>1 Q. You said you went to a DEA 2 conference in Fort Lauderdale. 3 Did anyone else from Rite 4 Aid come with you to go to that DEA -- 5 A. Yes. 6 Q. -- conference? 7 Let me finish my question. 8 I know you know where I'm going with it, 9 but just let me finish and then you can 10 answer, okay? 11 A. Yes. 12 Q. So let me ask that again. 13 The DEA conference that Rite 14 Aid sent you to in Fort Lauderdale, did 15 anyone else from Rite Aid come with you? 16 A. Yes. 17 Q. Who? 18 A. Debra Chase. 19 Q. And who is Debra Chase? 20 A. At the time, Debra Chase was 21 DEA coordinator for the Rx department. 22 Q. And you called it a DEA 23 conference. 24 Was it a conference that was</p>	<p style="text-align: right;">Page 20</p> <p>1 remember. 2 BY MR. POWERS: 3 Q. Do you know, when you went 4 back to your job at Rite Aid, did you 5 talk to anyone about what you saw at the 6 conference? 7 A. No. 8 Q. Did you go to any other 9 conferences put on by Buzzeo besides the 10 one in Fort Lauderdale? 11 A. No. 12 Q. Did you go to any other 13 conferences where the DEA had a presence? 14 A. No. 15 Q. Did you talk to any DEA 16 agents at the Buzzeo conference in Fort 17 Lauderdale? 18 A. No. 19 Q. Do you know if Debra Chase 20 talked to any DEA agents at the 21 conference in Fort Lauderdale? 22 A. I would not know that. 23 Q. Did you ever go to any other 24 conferences as part of your job duties at</p>
<p style="text-align: right;">Page 19</p> <p>1 put on by the DEA? 2 A. They did have actual DEA 3 folks there. We wasn't privy to that. 4 We was with the -- I guess the store 5 side, not the actual DEA. 6 I think the gentleman's name 7 was Mr. Buzzeo who was in charge of the 8 conference, which somehow he was 9 connected with Rite Aid. 10 Q. What kind of topics were 11 discussed at the DEA conference you went 12 to? 13 A. I don't remember. 14 Q. Did you get any written 15 materials from that conference? 16 A. I don't remember. It's been 17 so long. 18 Q. Do you remember, just 19 generally, what the topics were at the 20 DEA conference? 21 MR. LAVELLE: Object to 22 form. Objection. Asked and 23 answered. 24 THE WITNESS: I don't</p>	<p style="text-align: right;">Page 21</p> <p>1 Rite Aid? 2 A. Yes. 3 Q. Can you give me an example? 4 A. My -- I went to a conference 5 in, I think, Virginia. And that was on 6 the lines of -- if I can recollect, on 7 the lines of, I guess, pharmacists 8 stealing product, writing scripts or 9 something, people -- you know, something 10 along that line. 11 That was a while ago, too. 12 Q. Was that also over ten years 13 ago? 14 A. That was probably, if I 15 would have to say, 2008, maybe; '07 or 16 '08. 17 Q. And you referred to the 18 conference in Fort Lauderdale as a 19 conference put on by Buzzeo. 20 Do you know who the VA -- 21 the Virginia conference was put on by? 22 A. I don't remember. 23 Q. Who else was at that 24 conference with you from Rite Aid?</p>

<p style="text-align: right;">Page 22</p> <p>1 A. Rick Snyder. 2 Q. Who is Rick Snyder? 3 A. Rick Snyder was one of the 4 leads, at the time, for security. 5 Q. Was he working at the 6 Perryman distribution center? 7 A. Yes. 8 Q. Anyone else besides Rick 9 Snyder go to that conference with you? 10 A. Yes. 11 Q. Who else? 12 A. Ms. Joyce Sweitzer. 13 Q. And who is Joyce -- 14 A. She was -- 15 Q. -- Sweitzer? 16 MR. LABELLE: Wait until the 17 question is finished before you 18 answer. 19 THE WITNESS: Go ahead. 20 BY MR. POWERS: 21 Q. Who is Joyce Sweitzer? 22 A. They was the asset 23 protection manager. 24 Q. And was that also for the </p>	<p style="text-align: right;">Page 24</p> <p>1 A. Right, at my job. 2 Q. At the Perryman distribution 3 center? 4 A. Yes. We have a security, 5 like a middle meeting area, we left the 6 information in case anybody wanted to 7 look at it. That was about it. 8 Q. Did you ever talk to anyone 9 about what you learned at that conference 10 in Virginia? 11 A. No. 12 Q. Do you know what those 13 brochures that you left in the middle 14 area were about? 15 A. I believe, like I said, it 16 was about information on people that 17 would try to get extra scripts. That's 18 about all I can remember of that. 19 As I say, that's been a 20 while ago as well. 21 Q. So you said that you started 22 working at Rite Aid in September of 2000, 23 right? 24 A. Yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 Perryman distribution center? 2 A. Yes. 3 Q. Anyone else besides Rick 4 Snyder and Joyce Sweitzer? 5 A. No. 6 Q. Besides the conference down 7 in Virginia and the Fort Lauderdale 8 conferences, any other conferences you 9 went to as a Rite Aid employee? 10 A. No. 11 Q. Did you receive any written 12 materials from the conference that you 13 went to in Virginia? 14 A. Yes. 15 Q. What kind of written 16 materials did you get? 17 A. Some printouts, brochures. 18 Q. What did you do with those 19 written materials? 20 A. We left them at the middle 21 office, we call it, if anybody wanted to 22 take a look at any of that material. 23 Q. You say you left them at the 24 middle office? </p>	<p style="text-align: right;">Page 25</p> <p>1 Q. And are you currently still 2 employed by Rite Aid? 3 A. Yes, I am. 4 Q. And from September 2000 5 until current, have you always worked at 6 the Perryman distribution center? 7 A. Yes. 8 Q. What was your title when you 9 first started at the Perryman 10 distribution center? 11 A. Security associate. 12 Q. How long did you hold the 13 position of security associate? 14 A. If I can recollect, maybe 15 six months. 16 Q. After security associate, 17 did you have a different position? 18 A. Yes. 19 Q. What was that position? 20 A. They created a position 21 called DEA coordinator for security. 22 Q. How long were you the DEA 23 coordinator for security? 24 A. I want to say 2001 until </p>

<p>1 present.</p> <p>2 Q. Have you ever had any</p> <p>3 different titles besides security</p> <p>4 associate or DEA coordinator for</p> <p>5 security?</p> <p>6 A. Yes.</p> <p>7 Q. What other titles have you</p> <p>8 had?</p> <p>9 A. Lead.</p> <p>10 Q. And the title is just lead?</p> <p>11 There's no --</p> <p>12 A. Security lead.</p> <p>13 Q. Security lead, okay.</p> <p>14 A. Yes.</p> <p>15 Q. When did you first get the</p> <p>16 title of security lead?</p> <p>17 A. 2002.</p> <p>18 Q. How long were you a security</p> <p>19 lead for?</p> <p>20 A. Pretty much up until the --</p> <p>21 well, we got the -- we got promoted maybe</p> <p>22 two years ago. So I would say from 2002</p> <p>23 to 2016, maybe.</p> <p>24 Q. You said "we got promoted,"</p>	<p>Page 26</p> <p>1 A. Yes.</p> <p>2 Q. So from 2002 to 2016, you</p> <p>3 were both a security lead and the DEA</p> <p>4 coordinator for security, right?</p> <p>5 A. Yes.</p> <p>6 Q. Any other titles besides the</p> <p>7 ones we've already talked about?</p> <p>8 A. No, sir.</p> <p>9 Q. As the DEA coordinator for</p> <p>10 security, who did you report to?</p> <p>11 A. Still to my boss, which was</p> <p>12 Nathan Williams at the time.</p> <p>13 Q. Was Nathan Williams your</p> <p>14 boss the entire time you were a DEA</p> <p>15 coordinator for security?</p> <p>16 A. No.</p> <p>17 Q. Who else was your boss?</p> <p>18 A. A gentleman named Joseph</p> <p>19 Beck.</p> <p>20 Q. Anybody else?</p> <p>21 A. Joyce Sweitzer.</p> <p>22 Q. Besides Williams, Beck and</p> <p>23 Sweitzer, anyone else?</p> <p>24 A. In security, I think that</p>
<p>1 what are -- who are you referring to</p> <p>2 when --</p> <p>3 A. Everybody. Because we went</p> <p>4 from leads to supervisors.</p> <p>5 Q. So everyone who was a</p> <p>6 security lead got promoted to security</p> <p>7 supervisor around 2016?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Why was that?</p> <p>10 A. They did a change and</p> <p>11 decided to do without the leads</p> <p>12 throughout the whole facility. So for</p> <p>13 security, they changed us to -- from</p> <p>14 leads to supervisors.</p> <p>15 Q. So you were both a security</p> <p>16 lead and the DEA coordinator for security</p> <p>17 from 2002 until around 2016?</p> <p>18 A. Until present.</p> <p>19 Q. Well, you're not a security</p> <p>20 lead any more, you're a security</p> <p>21 supervisor, right?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So you stopped being a</p> <p>24 security lead in 2016, correct?</p>	<p>Page 27</p> <p>1 should be it.</p> <p>2 Q. Did you report to anyone</p> <p>3 different as a security lead?</p> <p>4 A. No.</p> <p>5 Q. What department in the</p> <p>6 distribution center were you a part of as</p> <p>7 a DEA coordinator for security?</p> <p>8 A. Could you repeat the</p> <p>9 question, please?</p> <p>10 Q. Sure.</p> <p>11 What department were you a</p> <p>12 part of as the DEA coordinator for</p> <p>13 security?</p> <p>14 A. Security.</p> <p>15 Q. There's a department called</p> <p>16 the security department at the</p> <p>17 distribution center?</p> <p>18 MR. LAVELLE: Object to</p> <p>19 form.</p> <p>20 THE WITNESS: The security</p> <p>21 department. Asset protection now.</p> <p>22 BY MR. POWERS:</p> <p>23 Q. Do you know when it switched</p> <p>24 from security to asset protection?</p>

<p>1 A. I don't remember.</p> <p>2 Q. Are there other people who</p> <p>3 have held the role of DEA coordinator for</p> <p>4 security at the Perryman distribution</p> <p>5 center?</p> <p>6 A. No.</p> <p>7 Q. You're the only one who has</p> <p>8 that title?</p> <p>9 A. Yes.</p> <p>10 Q. How about security lead,</p> <p>11 does anyone else have the title of</p> <p>12 security lead for the period of 2002</p> <p>13 through 2016?</p> <p>14 A. Yes.</p> <p>15 Q. Who else were the security</p> <p>16 leads?</p> <p>17 A. All right. You're going --</p> <p>18 I got to go back.</p> <p>19 Q. The ones you can remember.</p> <p>20 A. Okay. Ronald Welsh, Derrick</p> <p>21 Johnson, Howard Johnson, Richard Snyder,</p> <p>22 Jesse Jones.</p> <p>23 Let's see, who else can I</p> <p>24 remember? Cindy Smith.</p>	
	<p>Page 31</p> <p>1 That's all I can remember.</p> <p>2 Q. When you started your job as</p> <p>3 the DEA coordinator for security, how</p> <p>4 were you trained for your -- for that</p> <p>5 job?</p> <p>6 A. I was partnered up with</p> <p>7 Kevin Mitchell.</p> <p>8 Q. And who is Kevin Mitchell?</p> <p>9 A. At the time, Kevin Mitchell</p> <p>10 was the DEA for corporate.</p> <p>11 Q. Kevin Mitchell worked in the</p> <p>12 corporate office, not the distribution</p> <p>13 center; is that right?</p> <p>14 A. Yes, sir.</p>

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A horizontal bar chart illustrating the percentage of respondents who have heard of various environmental terms. The y-axis lists the terms, and the x-axis represents the percentage scale from 0% to 100%.

Term	Percentage (%)
Global warming	98
Green energy	95
Sustainable development	92
Renewable energy	90
Clean energy	88
Carbon footprint	85
Eco-friendly	82
Green technology	78
Renewable resources	75
Carbon emissions	72
Green products	68
Renewable energy sources	65
Carbon tax	62
Green building	58
Renewable power	55
Carbon reduction	52
Green infrastructure	48
Renewable electricity	45
Carbon capture	42
Green transportation	38
Renewable fuel	35
Carbon offset	32
Green architecture	28
Renewable materials	25
Carbon storage	22
Green design	18
Renewable water	15
Carbon reduction targets	12
Green waste management	8
Renewable land	5
Carbon pricing	3
Green energy storage	1

Term	Percentage (%)
Climate change	98
Global warming	95
Green energy	88
Sustainable development	85
Renewable energy	82
Eco-friendly	78
Carbon footprint	75
Green economy	72
Environmental protection	68
Conservation	65
Green technology	62
Carbon tax	58
Green building	55
Green infrastructure	52
Green jobs	48
Green transportation	45
Green products	42
Green living	38
Green space	35
Green architecture	32
Green waste	28
Green energy source	25
Green energy source	22
Green energy source	18
Green energy source	15
Green energy source	12
Green energy source	8
Green energy source	5
Green energy source	2
Green energy source	1

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Term	Percentage (%)
Global warming	95
Green energy	88
Sustainable development	85
Renewable energy	82
Clean energy	78
Carbon footprint	75
Green technology	72
Energy efficiency	68
Renewable resources	65
Green products	62
Carbon emissions	58
Renewable power	55
Green building	52
Renewable energy sources	48
Green infrastructure	45
Renewable electricity	42
Green economy	38
Renewable energy alternatives	35
Green energy solutions	32
Renewable energy options	28
Green energy technologies	25
Renewable energy sources	22
Green energy industry	18
Renewable energy market	15
Green energy future	12
Renewable energy future	8
Green energy future	5

A horizontal bar chart illustrating the percentage of respondents who have heard of various environmental terms. The y-axis lists the terms, and the x-axis represents the percentage scale from 0% to 100%.

Term	Percentage (%)
Global warming	95
Green energy	92
Sustainable development	88
Carbon footprint	85
Renewable energy	82
Eco-friendly	80
Green technology	78
Carbon tax	75
Renewable resources	72
Green building	68
Carbon emissions	65
Renewable power	62
Green products	58
Carbon reduction	55
Renewable energy sources	52
Green infrastructure	48
Carbon capture	45
Renewable electricity	42
Green space	38
Carbon offset	35
Renewable fuel	32
Green architecture	28
Carbon storage	25
Renewable water	22
Green transportation	18
Carbon reduction targets	15
Renewable materials	12
Green infrastructure projects	8
Carbon pricing	5

Page 38

[REDACTED]

23 Q. I'm going to hand you what's
24 been marked as Ringgold Exhibit-1. It's

Page 40

[REDACTED]

Page 39

¹ Bates number Rite_Aid_OMDL_0049982
² through 49993.

3 - - -

4 (Whereupon,
5 Rite Aid-Ringgold Exhibit-1,
6 Rite_Aid_OMDL_0049982-993, was
7 marked for identification.)

8 - - -

9 BY MR. POWERS:

10 Q. Just take a brief look at
11 that and just let me know when you're
12 done.

13 Does this document,
14 Exhibit-1, look familiar to you?

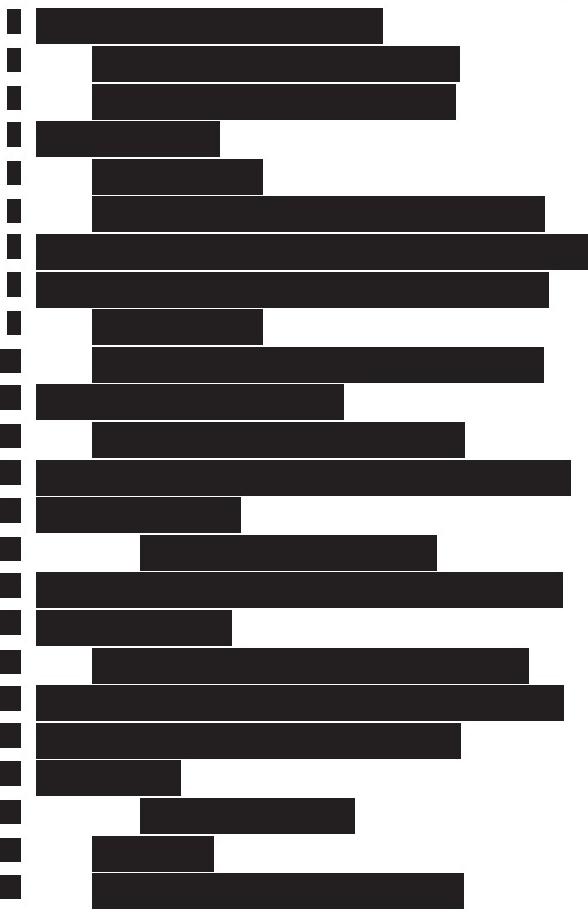
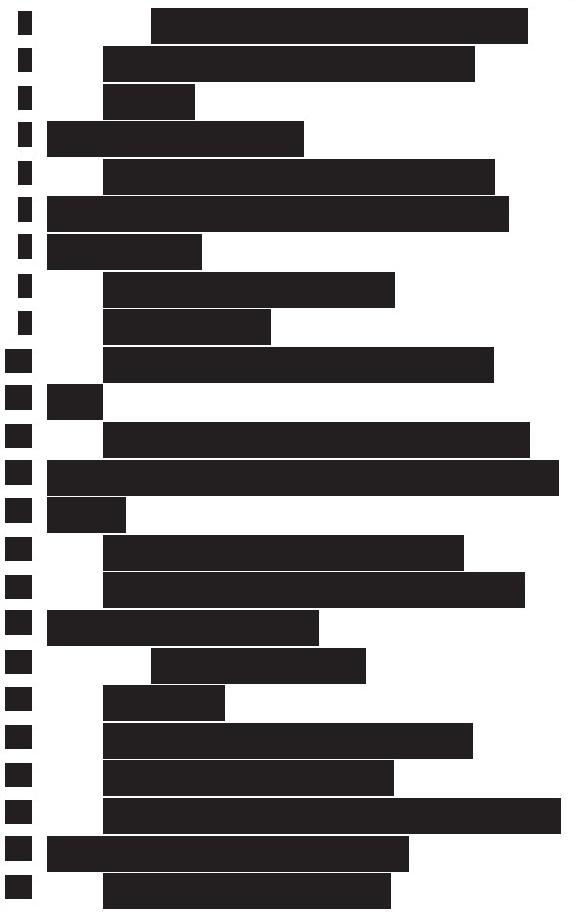
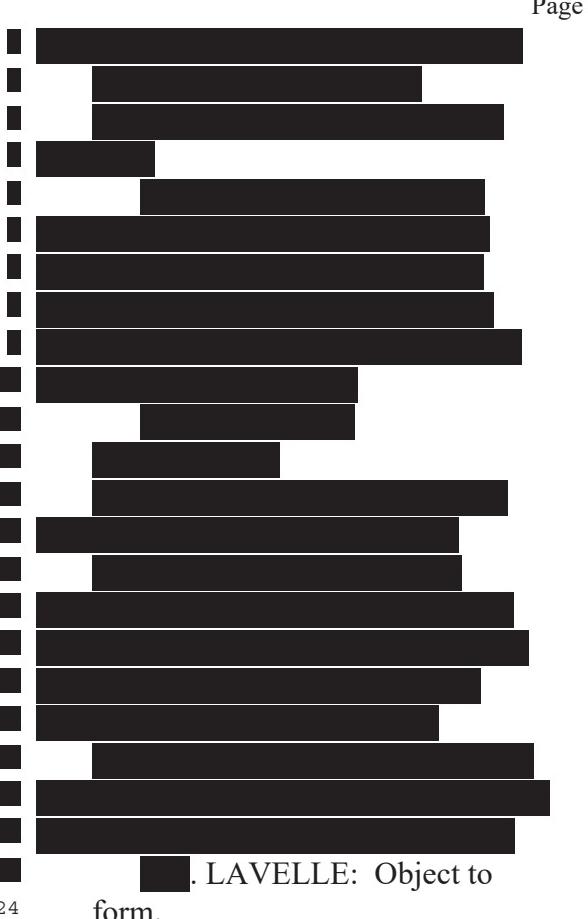
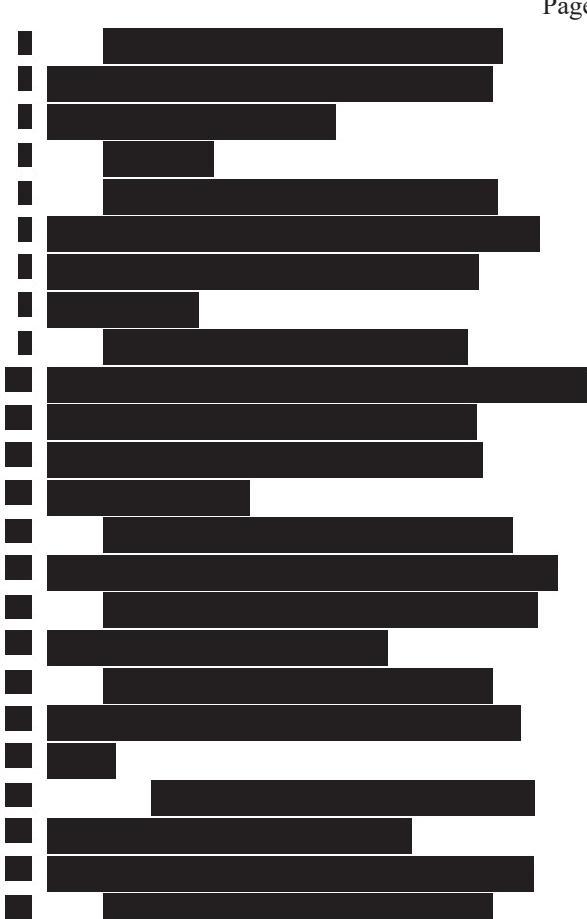
15 A. Yes, it does.

16 Q. What is the document
17 reflected in Exhibit-1?

[REDACTED]

Page 41

[REDACTED]

<p style="text-align: center;">Page 42</p> 	<p style="text-align: center;">Page 44</p> 
<p style="text-align: center;">Page 43</p>  <p style="text-align: center;">[REDACTED]. LAVELLE: Object to form.</p>	<p style="text-align: center;">Page 45</p> 

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2 Q. You can put that exhibit
3 aside.

5 (Whereupon,
6 Rite Aid-Ringgold Exhibit-2,
7 Rite_Aid_OMDL_0032421, was marked
8 for identification.)

10 (Whereupon,
11 Rite Aid-Ringgold Exhibit-3,
12 Rite_Aid_OMDL_0032422, was marked
13 for identification.)

15 BY MR. POWERS:

16 Q. I'm going to hand you next
17 what's been marked as Exhibits-2 and 3.
18 The first exhibit, Exhibit-2, is Bates
19 stamped Rite_Aid_OMDL_0032421. And then
20 Exhibit-3, which is the e-mail attachment
21 to Exhibit-2, is Bates stamped
22 Rite_Aid_OMDL_0032422.

23 And the Exhibit-3 is -- has
24 a bunch of pages. I'm just going to ask

¹ you about a couple of questions -- I'm
² just going to ask you a couple of
³ questions about a couple particular
⁴ pages.

Page 46

Page 48

Page 47

Page 49

[REDACTED]

Page 52

1 time limit on trying to close cases.

2 Q. Those would be shortage
3 claim cases?

4 A. Yes.

5 Q. What was the time limit to
6 close those?

7 A. I believe we had 48 hours.

8 Q. And what did you do to close
9 a shortage claim case?

10 A. Just investigate.

11 Q. What did you do to
12 investigate?

13 A. I would start getting
14 information from either Debra Chase,
15 Marian Woods or Keith Frost.

16 Q. What kind of information
17 would you get from those individuals?

18 A. Who picked, who was the
19 person that picked it, who was the person
20 that inventoried it at the desk. And
21 from there, [REDACTED]

[REDACTED]

Page 53

9 Q. So when you have an X in the
10 column closed here on Page 3 of
11 Exhibit-3, what does the X there mean in
12 the closed column?

13 A. Meaning we were done.

14 Meaning, we close it out on the security
15 side.

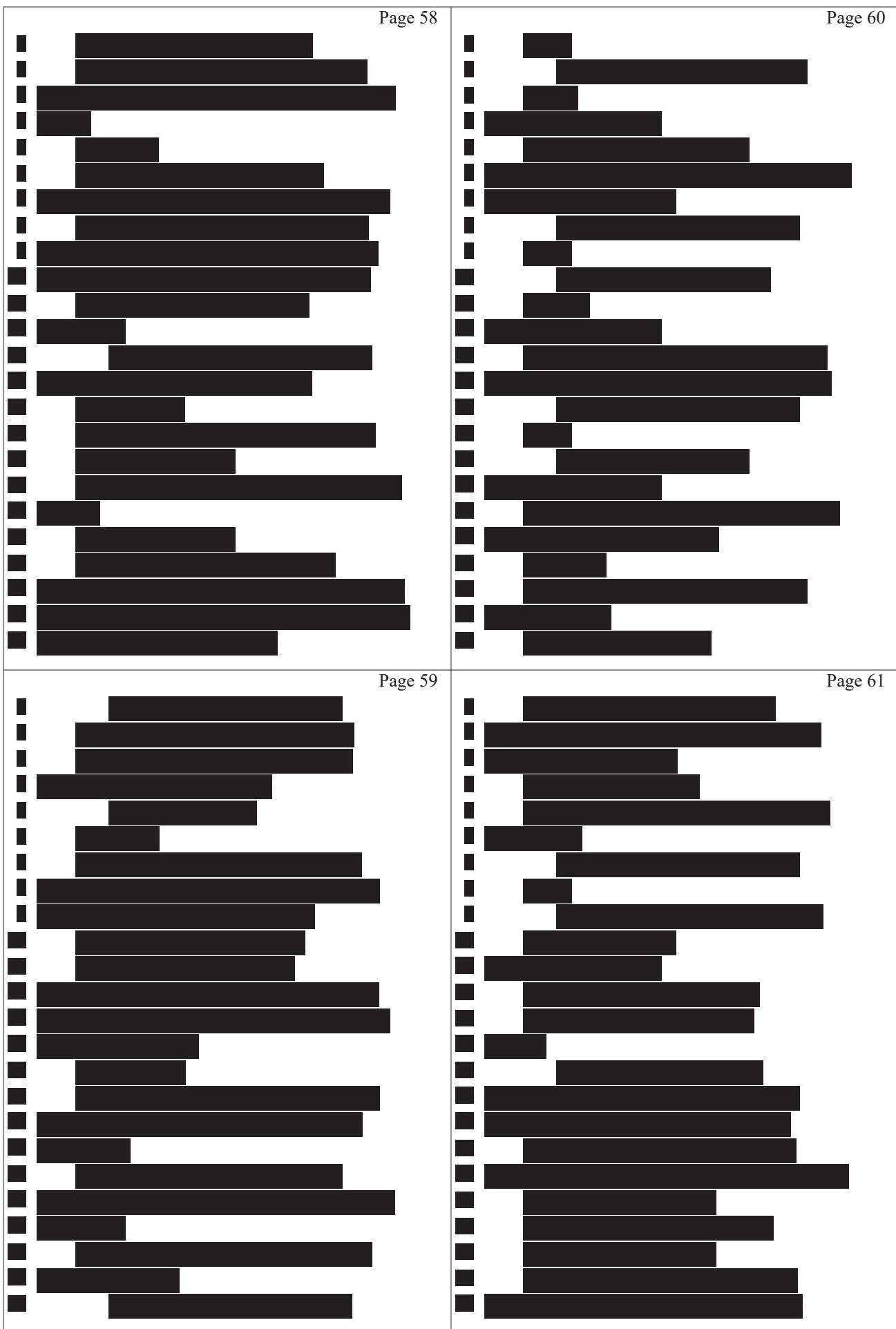
16 Q. Does that mean you found the
17 missing product?

18 A. On that particular one, I
19 can't -- I could not say yes or no to.
20 But it was closed out on our end.

21 Q. Where would you find the
22 information about how this was closed
23 out?

24 A. Repeat that question,

<p>1 please.</p> <p>2 Q. Yes. Maybe it wasn't the</p> <p>3 best question.</p> <p>4 So it's marked closed on</p> <p>5 this tracking sheet. Where would I find</p> <p>6 the information about how this particular</p> <p>7 claim for negative 2 bottles of</p> <p>8 hydrocodone/APAP went?</p> <p>9 A. Where it went? Normally, if</p> <p>10 I can go back in my memory, I believe</p> <p>11 when I say closed, meaning it was found.</p> <p>12 Q. Was there any record of</p> <p>13 where the -- where the product was found,</p> <p>14 besides just the information here that it</p> <p>15 was closed?</p> <p>16 A. I don't remember.</p> <p>17 Q. In the next row down, it</p> <p>18 looks like it's for Store 7766?</p> <p>19 A. Yes.</p> <p>20 Q. And over in the shortage</p> <p>21 claim column, it says, One each, and in</p> <p>22 parentheses, Rx overstock.</p> <p>23 Do you see that?</p> <p>24 A. I do.</p>	<p>Page 54</p> <p>1 A. I can't remember.</p> <p>2 But I'm sure if I was out,</p> <p>3 my boss -- I mean, they still -- things</p> <p>4 still have to go on if I'm not there,</p> <p>5 so --</p> <p>6 Q. And what did you use these</p> <p>7 tracking sheets for after they were</p> <p>8 filled out?</p> <p>9 A. I didn't use them for</p> <p>10 anything.</p> <p>11 Q. Do you know if your boss</p> <p>12 used them for anything?</p> <p>13 A. I could not say.</p> <p>14 Q. Do you know if anyone else</p> <p>15 used them for anything?</p> <p>16 A. I could not say. I would</p> <p>17 not know.</p> <p>18 Q. So besides just filling</p> <p>19 these out, that's your involvement with</p> <p>20 them?</p> <p>21 A. Yes. Like I said, my role</p> <p>22 was small. Yes.</p> <p>23 Q. You can put that exhibit</p> <p>24 over to the side, Mr. Ringgold.</p>
<p>1 Q. What does that mean?</p> <p>2 A. That might have been the</p> <p>3 area where it was. I don't remember.</p> <p>4 Q. Would a positive number in</p> <p>5 the shortage claim column here represent</p> <p>6 that the store got an extra unit of</p> <p>7 whatever the product name was?</p> <p>8 A. I don't remember.</p> <p>9 Q. Do you still use these sort</p> <p>10 of weekly investigation tracking sheets?</p> <p>11 A. No.</p> <p>12 Q. When did you stop using</p> <p>13 them?</p> <p>14 A. Once we stopped doing the</p> <p>15 drug investigations back in 2014.</p> <p>16 Q. So these weekly</p> <p>17 investigation tracking sheets were only</p> <p>18 for controlled drugs?</p> <p>19 A. I can't remember.</p> <p>20 Q. Did you personally fill out</p> <p>21 these weekly investigation tracking</p> <p>22 sheets?</p> <p>23 A. Yes.</p> <p>24 Q. Did anyone else?</p>	<p>Page 55</p> <p>1 - - -</p> <p>2 (Whereupon,</p> <p>3 Rite Aid-Ringgold Exhibit-4,</p> <p>4 Rite_Aid_OMDL_0027551-552, was</p> <p>5 marked for identification.)</p> <p>6 - - -</p> <p>7 BY MR. POWERS:</p> <p>8 Q. I've got an Exhibit-4 here.</p> <p>9 And the Bates number on this exhibit is</p> <p>10 Rite_Aid_OMDL_0027551 through 7552.</p> <p>11 Go ahead and take a look at</p> <p>12 that.</p> <p>13 A. Thank you.</p> 



Page 62

[REDACTED]

Page 64

2 Q. Okay. That's all. We're
3 done with that exhibit.

4 - - -
5 (Whereupon,
6 Rite Aid-Ringgold Exhibit-5,
7 Rite_Aid_OMDL_21461-463, was
8 marked for identification.)
9 - - -

10 BY MR. POWERS:

11 Q. I want to hand you what's
12 been marked as Exhibit-5. It is an
13 e-mail string, and the Bates number is
14 Rite_Aid_OMDL_21461 through 21463.
15 Take a second to review
16 that.

17 A. Thank you.

18 Q. I'll direct your attention
19 to the second-to-last page of Exhibit-5.

[REDACTED]

Page 63

[REDACTED]

Page 65

2 [REDACTED]
3 Do you see that?

4 A. I do.

5 Q. Who is Kim Brown?

6 A. She might have had something
7 to do with Rx at the time. I can't
remember her exact position.

8 Q. How about Tahir Senoussa?

9 A. Same. He was one of the
10 managers at the time. He might have been
11 in Rx at the time as well.

12 Q. And is M. Wood, Marian Wood?

13 A. That is correct.

14 Q. And D. Chase, is that Debra
15 Chase?

16 A. Yes.

17 Q. And L.N. Ringgold, is that
18 you, Larry Ringgold?

19 A. That is correct.

20 Q. How come you copied yourself
21 on this e-mail?

22 A. I don't remember.

23 Q. You say in the e-mail, Hello
24 to all. I would like to have a quick

Page 66	Page 68
<p>1 briefing with day and night shift 2 associates that work in the cage. I just 3 want to go over a few procedures with the 4 scanning of their badges in and out of 5 the cage. I would like to get with all 6 the cage associates next week. 7 Do you see that? 8 A. I do. 9 Q. What were you referring to 10 here when you wanted -- when you were 11 referring to the procedures about 12 scanning their badges in and out of the 13 cage? 14 A. We had a few folks that was 15 getting locked in the cage. So what was 16 happening, they wasn't doing a proper 17 swipe. They would swipe in. But to go 18 out, sometimes if you hit it twice, it 19 would think you were still in the cage 20 but you would actually be out. 21 So I just had to explain to 22 them how to swipe in and out, because we 23 were getting a lot of calls to the front, 24 hey, I'm stuck in the cage. So we had to</p>	<p>1 A. I do. 2 Q. Why did -- do you know why 3 Marian Wood and Kim Brown wanted to see 4 what you were going over with the cage 5 associates? 6 MR. LAVELLE: Object to 7 form. 8 THE WITNESS: I would -- I 9 don't know why, no. 10 BY MR. POWERS: 11 Q. It sounds like Marian Wood 12 wanted to make sure it's in line with the 13 procedures of the distribution center, 14 right? 15 MR. LAVELLE: Object to 16 form. 17 THE WITNESS: According to 18 the e-mail. 19 BY MR. POWERS: 20 Q. Was there any time when you 21 gave procedures that were not in line 22 with the procedures at the Rite Aid 23 distribution center? 24 A. Not that I'm aware of.</p>
<p>1 let them know, hey, when it happens, 2 don't swipe it, just call us and we would 3 hit the anti-passback button. 4 So I just wanted to brief 5 folks on that. That was it. 6 Q. Going to the first page of 7 Exhibit-5, at the bottom there, it looks 8 like an e-mail from Marian Wood to you 9 saying, Larry, would it be possible for 10 Kim and I to see what you are going over 11 with them? 12 Do you see that? 13 A. I do. 14 Q. In the e-mail above that, 15 it's Marian Wood just to Kim Brown, 16 saying, Kim, I want to be sure what he is 17 going over and make sure it is in line 18 with our procedures. 19 Do you see that? 20 A. I do. 21 Q. And Marian -- excuse me, Kim 22 Brown responded, at the top e-mail, there 23 to Marian Wood, Good call, dot, dot, dot. 24 Do you see that?</p>	<p>1 Q. It seems like Marian Wood 2 thinks there were, right, from that 3 e-mail on the first page of Exhibit-5? 4 MR. LAVELLE: Object to 5 form. 6 THE WITNESS: I couldn't 7 speculate for Marian. 8 BY MR. POWERS: 9 Q. And it seems like Kimberly 10 Brown agrees, because she says, Good 11 call. 12 Do you see that at the top 13 there? 14 A. I see that. 15 MR. LAVELLE: Object to 16 form. 17 BY MR. POWERS: 18 Q. You can place that exhibit 19 to the side. 20 - - - 21 (Whereupon, 22 Rite Aid-Ringgold Exhibit-6, 23 Rite_Aid_OMDL_23456-457, was 24 marked for identification.)</p>

Page 70

1 - - -

2 BY MR. POWERS:

3 Q. I'm going to hand you what's
4 been marked as Ringgold Exhibit-6. It is
5 Bates stamped Rite_Aid_OMDL_23456 through
6 23457.

7 A. Thank you.

[REDACTED]

Page 72

[REDACTED]

Page 71

[REDACTED]

Page 73

[REDACTED]

	Page 74	Page 76
1	Do you see that?	[REDACTED]
2	A. I do.	[REDACTED]
3	Q. So Marian Wood is saying	[REDACTED]
4	that you kept a log of all the Rx cage	[REDACTED]
5	and vault tests, right?	[REDACTED]
6	MR. LAVELLE: Object to	[REDACTED]
7	form. Objection. Vague.	[REDACTED]
8	The question is about the	[REDACTED]
9	e-mails that Mr. Ringgold was not	[REDACTED]
10	copied on and did not send or	[REDACTED]
11	receive.	[REDACTED]
12	MR. POWERS: John, just	[REDACTED]
13	objection to form is fine.	[REDACTED]
14	BY MR. POWERS:	[REDACTED]
15	Q. Mr. Ringgold, did you keep a	[REDACTED]
16	log of the Rx cage and vault tests?	[REDACTED]
17	A. I did not keep a log.	[REDACTED]
18	Q. You did not keep a log?	[REDACTED]
19	A. No.	[REDACTED]
20	Q. Did anyone keep a log of the	[REDACTED]
21	Rx cage and vault tests?	[REDACTED]
22	A. Not a log. I kept a -- an	[REDACTED]
23	actual report.	[REDACTED]
24	Q. So you kept all of the	[REDACTED]
	Page 75	Page 77
1	reports that were generated from the	[REDACTED]
2	tests?	[REDACTED]
3	A. We had to.	[REDACTED]
4	Q. What kind of report was	[REDACTED]
5	generated from these tests?	[REDACTED]
6	A. Just to show that the alarms	[REDACTED]
7	were working and the motion tests were	[REDACTED]
8	going off.	[REDACTED]
9	Q. Was it a written report?	[REDACTED]
10	A. It was -- yes. Not really	[REDACTED]
11	written, but just showed actual motion 1,	[REDACTED]
12	motion 2, whatever, that it would go off.	[REDACTED]
13	And that was part of the DEA	[REDACTED]
14	compliance.	[REDACTED]
15	Q. Was that a -- was that,	[REDACTED]
16	like, a printout or something or --	[REDACTED]
17	A. Yes, it was a printout	[REDACTED]
18	from --	[REDACTED]
19	MR. LAVELLE: Wait until the	[REDACTED]
20	question is finished before you	[REDACTED]
21	answer it.	[REDACTED]
22	THE WITNESS: Yes.	[REDACTED]
23	MR. LAVELLE: Otherwise the	[REDACTED]
24	record is going to be messed up.	[REDACTED]

Page 78

[REDACTED]

22 MR. LAVELLE: Counsel, is
23 this a convenient time? We've
24 been going for over an hour. Can

Page 79

1 we take a break?

2 MR. POWERS: We can take a
3 break if you'd like. I'll say, if
4 you want to power through for
5 another 20 minutes or so, we might
6 be all ready to go home.

7 MR. LAVELLE: I appreciate
8 that, but I do need to use the
9 restroom.

10 MR. POWERS: We'll take a
11 short break, then.

12 VIDEO TECHNICIAN: The time
13 is now 6:07 p.m. We are going off
14 the record.

15 - - -

16 (Whereupon, a brief recess
17 was taken.)

18 - - -

19 VIDEO TECHNICIAN: The time
20 is now 6:20 p.m. We are back on
21 the record.

22 BY MR. POWERS:

23 Q. Welcome back, Mr. Ringgold.

24 - - -

Page 80

1 (Whereupon,
2 Rite Aid-Ringgold Exhibit-7,
3 Rite_Aid_OMDL_0012020-021, was
4 marked for identification.)
5 - - -

6 BY MR. POWERS:

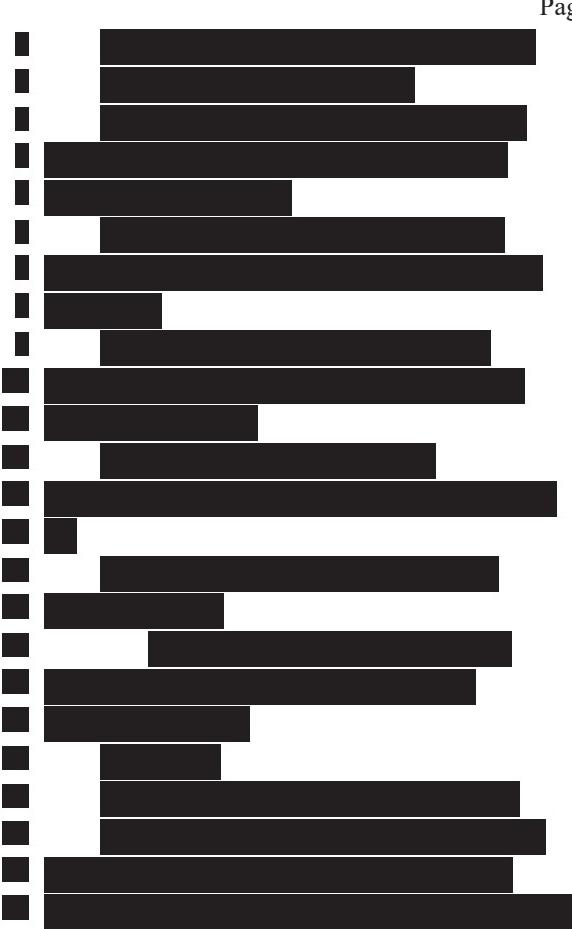
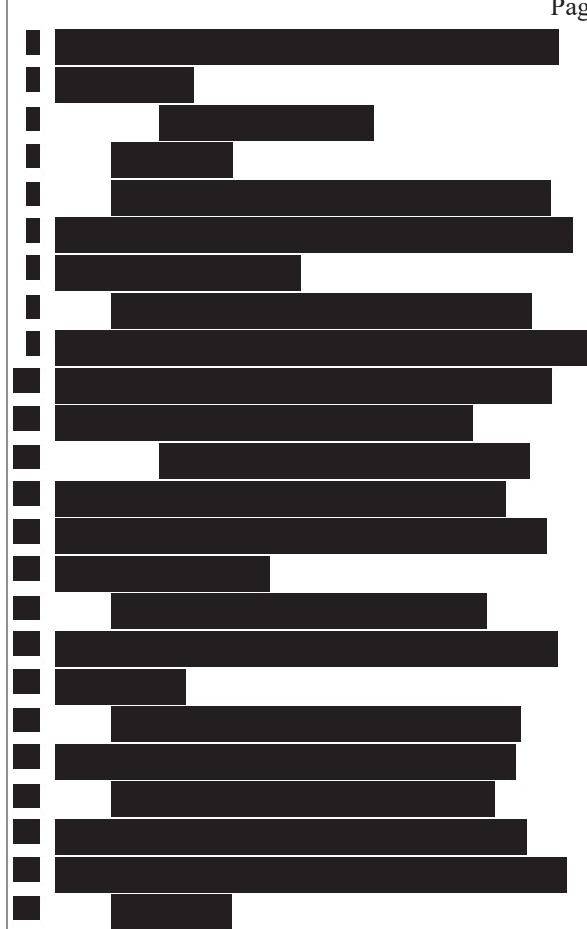
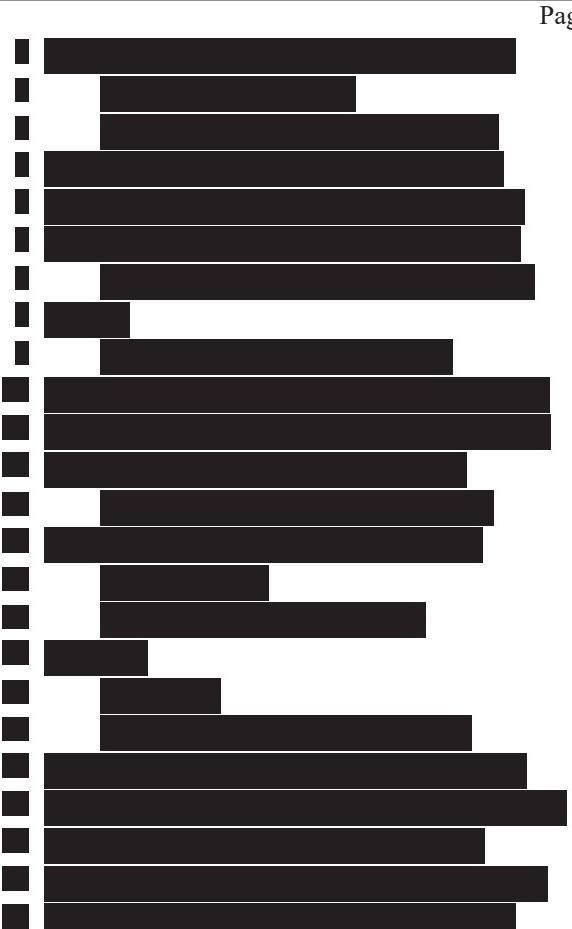
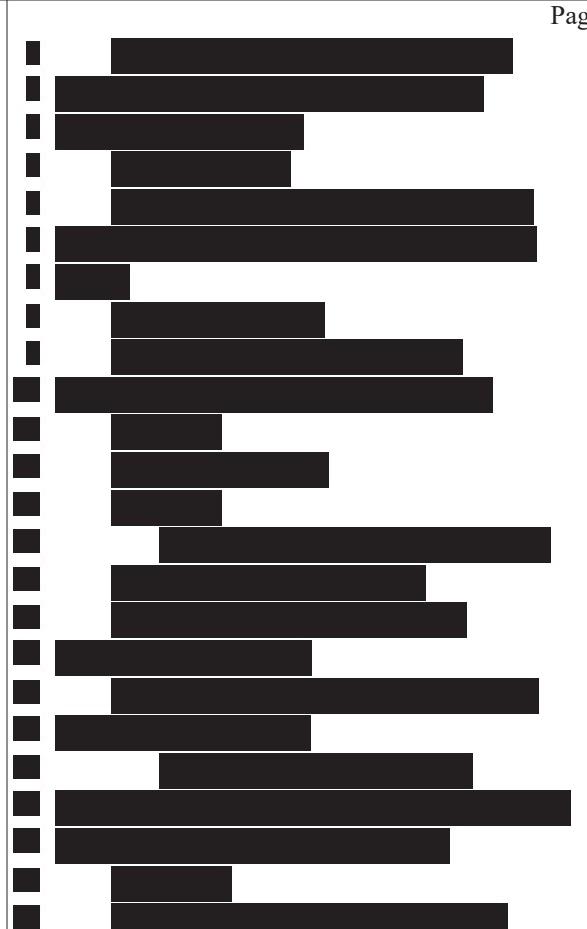
7 Q. I'm going to hand you what
8 has been marked as Exhibit-7. And the
9 Bates number on this exhibit is
10 Rite_Aid_OMDL_0012020 through 12021.
11 Take a look at that e-mail.

12 A. Thank you.

[REDACTED]

Page 81

[REDACTED]

ANSWER

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Page 88

A horizontal bar chart illustrating the percentage of respondents who have heard of various environmental terms. The y-axis lists the terms, and the x-axis represents the percentage from 0% to 100%.

Term	Percentage (%)
Global warming	98
Green energy	95
Sustainable development	92
Clean water	90
Renewable energy	88
Carbon footprint	85
Recycling	82
Biodiversity	78
Organic food	75
Eco-friendly	72
Green technology	68
Green building	65
Green economy	62
Green infrastructure	58
Green space	55
Green transportation	52
Green architecture	48
Green products	45
Green living	42
Green lifestyle	38
Green products	35
Green infrastructure	32
Green economy	28
Green building	25
Green technology	22
Green transportation	18
Green architecture	15
Green products	12
Green living	8
Green lifestyle	5

Page 3

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Term	Percentage (%)
Global warming	95
Green energy	88
Sustainable development	85
Clean water	82
Renewable energy	80
Carbon footprint	78
Recycling	75
Biodiversity	72
Organic food	68
Eco-friendly	65
Green technology	62
Conservation	58
Green building	55
Green economy	52
Green infrastructure	48
Green space	45
Green transport	42
Green jobs	38
Green architecture	35
Green products	32
Green living	28
Green lifestyle	25
Green products	22
Green architecture	18
Green infrastructure	15
Green transport	12
Green jobs	10
Green economy	8
Green building	5
Green conservation	3
Green technology	2
Green space	1
Green products	0

A horizontal bar chart illustrating the percentage of respondents who have heard of various mental health terms. The y-axis lists the terms, and the x-axis represents the percentage scale from 0% to 100%.

Term	Percentage (%)
Depression	98
Anxiety	95
Obsessive Compulsive Disorder (OCD)	85
Post-Traumatic Stress Disorder (PTSD)	75
Generalized Anxiety Disorder (GAD)	70
Major Depressive Disorder (MDD)	68
Bipolar Disorder	65
Borderline Personality Disorder (BPD)	60
Schizophrenia	55
Attention Deficit Hyperactivity Disorder (ADHD)	50
Autism Spectrum Disorder (ASD)	45
Generalized Anxiety	40
Major Depressive	38
Obsessive Compulsive	35
Post Traumatic Stress	32
Borderline Personality	28
Schizophrenic	25
Autistic	22
Attention Deficit	20
Personality	18
Disorder	15
Disorders	12
Disorder	10
Disorders	8
Disorder	5
Disorders	3
Disorder	2
Disorders	1

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Page 92

[REDACTED]

9 Q. I'm going to move on to a
10 new exhibit here. You can put that one
11 to the side.

12 - - -

13 (Whereupon,
14 Rite Aid-Ringgold Exhibit-8,
15 Rite_Aid_OMDL_0011115-116, was
16 marked for identification.)

17 - - -

18 BY MR. POWERS:

19 Q. I marked Ringgold Exhibit-8,
20 it is a two-page document with the Bates
21 number Rite_Aid_OMDL_0011115 through
22 11116.

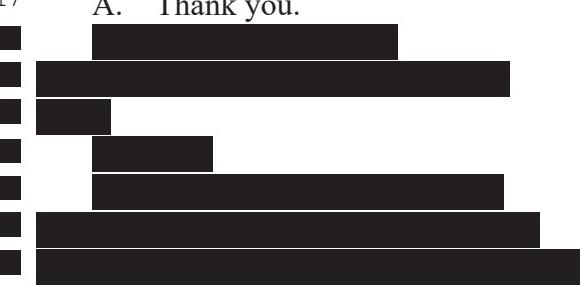
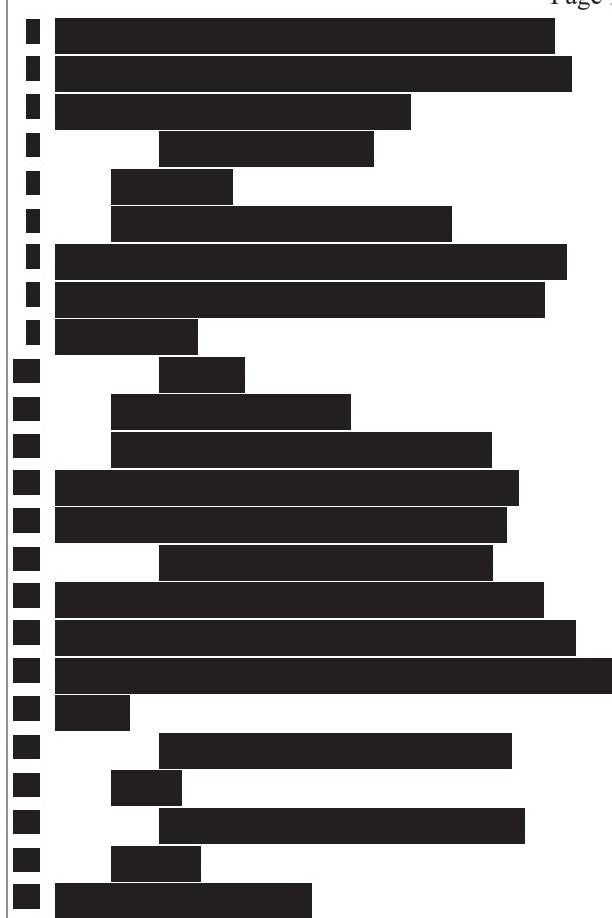
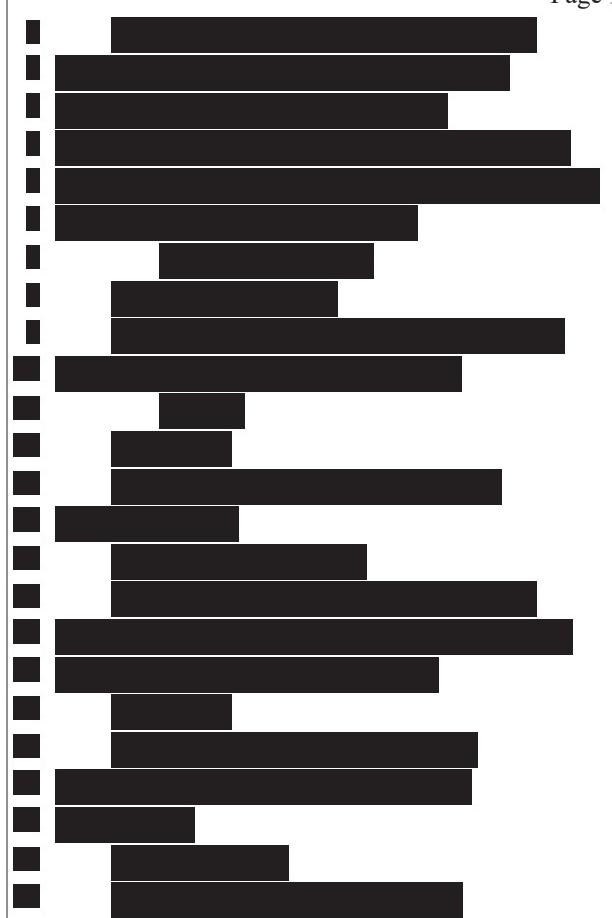
[REDACTED]

Page 91

Page 93

[REDACTED]

[REDACTED]

<p style="text-align: right;">Page 94</p>  <p style="text-align: right;">Page 95</p> <p>4 - - -</p> <p>5 (Whereupon,</p> <p>6 Rite Aid-Ringgold Exhibit-9,</p> <p>7 Rite_Aid_OMDL_0003108-109, was</p> <p>8 marked for identification.)</p> <p>9 - - -</p> <p>10 BY MR. POWERS:</p> <p>11 Q. You can put that exhibit to</p> <p>12 the side. I'm going to hand you what's</p> <p>13 been marked as Exhibit-9. It's a</p> <p>14 two-page document with the Bates stamp of</p> <p>15 Rite_Aid_OMDL_0003108 through 3109.</p> <p>16 Take a look at that one.</p> <p>17 A. Thank you.</p> 	<p style="text-align: left;">Page 96</p>  <p style="text-align: left;">Page 97</p> 
---	--

Page 98

[REDACTED]

Page 100

[REDACTED]
5 - - -
6 (Whereupon,
7 Rite Aid-Ringgold Exhibit-10,
8 Rite_Aid_OMDL_0010795-796, was
9 marked for identification.)
10 - - -

11 BY MR. POWERS:

12 Q. I'll hand you an exhibit
13 that's been marked Exhibit-10. It's
14 Bates stamped Rite_Aid_OMDL_0010795
15 through 0010796.

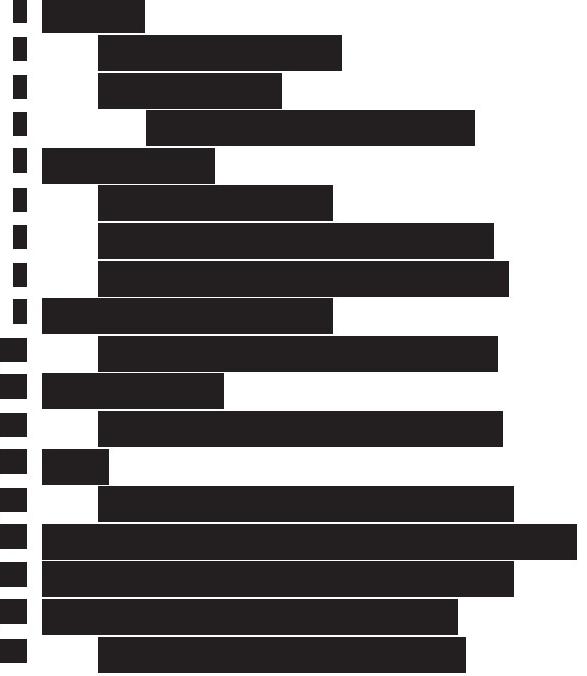
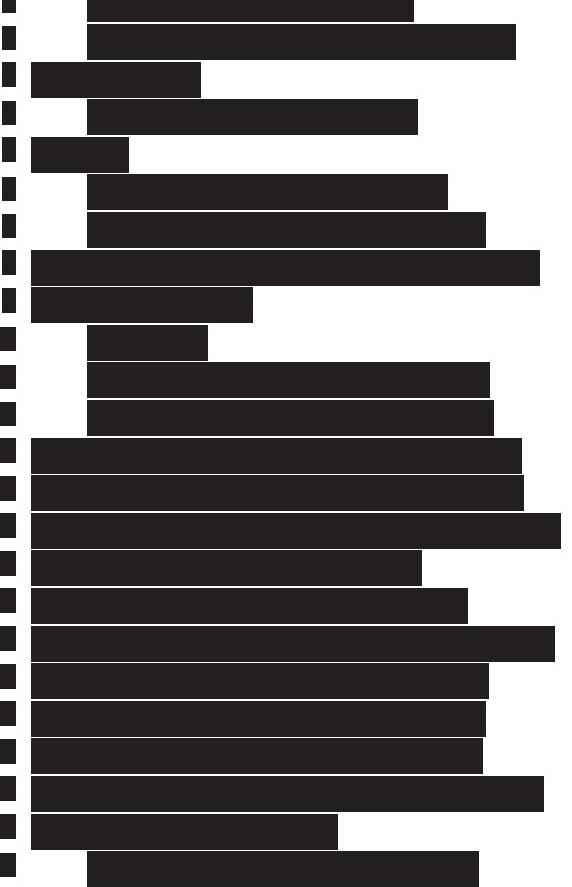
16 A. Thank you.

Page 99

[REDACTED]

Page 101

[REDACTED]

<p style="text-align: center;">Page 102</p> 	<p style="text-align: center;">Page 104</p>  <p>19 Q. You can put that exhibit to 20 the side.</p> <p>21 I want to go back to 22 something we were talking about earlier, 23 the Buzzeo conference that you went to 24 down in Fort Lauderdale.</p>
<p style="text-align: center;">Page 103</p> 	<p style="text-align: center;">Page 105</p> <p>1 Do you know why you were 2 selected to go to that particular 3 conference?</p> <p>4 A. I don't remember. I believe 5 because I was security DEA.</p> <p>6 Q. Who made that decision that 7 you would go to that conference?</p> <p>8 MR. LAVELLE: Object to 9 form.</p> <p>10 THE WITNESS: I wouldn't 11 know. It could have possibly been 12 the GM. I'm not sure.</p> <p>13 BY MR. POWERS:</p> <p>14 Q. And how about the conference 15 in Virginia that you went to with Rick 16 Snyder, Joyce Sweitzer, do you know why 17 you were selected to go to that 18 conference?</p> <p>19 A. I do not.</p> <p>20 Q. Who told you that you could 21 go to that conference?</p> <p>22 A. Ms. Joyce Sweitzer.</p> <p>23 Q. Is there any reason why you 24 didn't attend any other Buzzeo</p>

<p>1 conferences after the one you attended in 2 Fort Lauderdale? 3 A. Budget. 4 Q. How do you know that? 5 A. I think we were -- we wanted 6 to go to some other stuff, but they said 7 because of budgets, we could not go. 8 Q. Do you know when that was? 9 A. I do not remember, no. 10 Q. Did anyone from the Perryman 11 distribution center go to those other 12 Buzzeo conferences that you were not able 13 to? 14 A. I wouldn't know. 15 MR. POWERS: That's all I 16 have. 17 MR. LAVELLE: I have some 18 brief questioning of the witness, 19 but I guess we should switch 20 places. 21 VIDEO TECHNICIAN: The time 22 is now 6:47 p.m. We're going off 23 the record. 24 - - -</p>		<p>Page 106</p>
<p>1 (Whereupon, a brief recess 2 was taken.) 3 - - - 4 VIDEO TECHNICIAN: The time 5 is now 6:54 p.m. We are back on 6 the record. 7 - - - 8 EXAMINATION 9 - - - 10 BY MR. LAVELLE: 11 Q. Hello, Mr. Ringgold. John 12 Lavelle, representing Rite Aid. I have 13 just a few questions for you. 14 I'd like to ask you first 15 to -- following up on the documents 16 Ringgold-8 and 9 that were discussed with 17 you by counsel for plaintiff earlier. 18 Do you have those in front 19 of you, sir? 20 A. Yes, I do.</p>		<p>Page 107</p>
<p>1 (Whereupon, a brief recess 2 was taken.) 3 - - - 4 VIDEO TECHNICIAN: The time 5 is now 6:54 p.m. We are back on 6 the record. 7 - - - 8 EXAMINATION 9 - - - 10 BY MR. LAVELLE: 11 Q. Hello, Mr. Ringgold. John 12 Lavelle, representing Rite Aid. I have 13 just a few questions for you. 14 I'd like to ask you first 15 to -- following up on the documents 16 Ringgold-8 and 9 that were discussed with 17 you by counsel for plaintiff earlier. 18 Do you have those in front 19 of you, sir? 20 A. Yes, I do.</p>		<p>Page 109</p>

Page 110

Page 112

A horizontal bar chart illustrating the percentage of respondents who have heard of various mental health terms. The y-axis lists the terms, and the x-axis represents the percentage from 0% to 100%.

Term	Percentage (%)
Depression	98
Anxiety	95
Obsessive Compulsive Disorder (OCD)	85
Post-Traumatic Stress Disorder (PTSD)	78
Generalized Anxiety Disorder (GAD)	75
Major Depressive Disorder (MDD)	72
Bipolar Disorder	68
Borderline Personality Disorder (BPD)	65
Schizophrenia	62
Attention Deficit Hyperactivity Disorder (ADHD)	58
Autism Spectrum Disorder (ASD)	55
Generalized Anxiety Disorder (GAD)	52
Major Depressive Disorder (MDD)	50
Obsessive Compulsive Disorder (OCD)	48
Post-Traumatic Stress Disorder (PTSD)	45
Borderline Personality Disorder (BPD)	42
Schizophrenia	40
Autism Spectrum Disorder (ASD)	38
Attention Deficit Hyperactivity Disorder (ADHD)	35
Generalized Anxiety Disorder (GAD)	32
Major Depressive Disorder (MDD)	30
Obsessive Compulsive Disorder (OCD)	28
Post-Traumatic Stress Disorder (PTSD)	25
Borderline Personality Disorder (BPD)	22
Schizophrenia	20
Autism Spectrum Disorder (ASD)	18
Attention Deficit Hyperactivity Disorder (ADHD)	15
Generalized Anxiety Disorder (GAD)	12
Major Depressive Disorder (MDD)	10
Obsessive Compulsive Disorder (OCD)	8
Post-Traumatic Stress Disorder (PTSD)	5
Borderline Personality Disorder (BPD)	3
Schizophrenia	2
Autism Spectrum Disorder (ASD)	1
Attention Deficit Hyperactivity Disorder (ADHD)	0

1 Ringgold-11.
2 A. I've read it.
3 Q. Mr. Ringgold, do you
4 recognize this document we've marked for
5 identification as Ringgold-11?

6 A. Yes, I do.
7 Q. What is it?

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Page 113

Term	Percentage
GMOs	~95%
Organic	~90%
Natural	~75%
Artificial	~25%
Organic	~95%
Natural	~90%
Artificial	~25%
Organic	~95%
Natural	~90%
Artificial	~25%

Q. All right. I'd like to mark an exhibit.

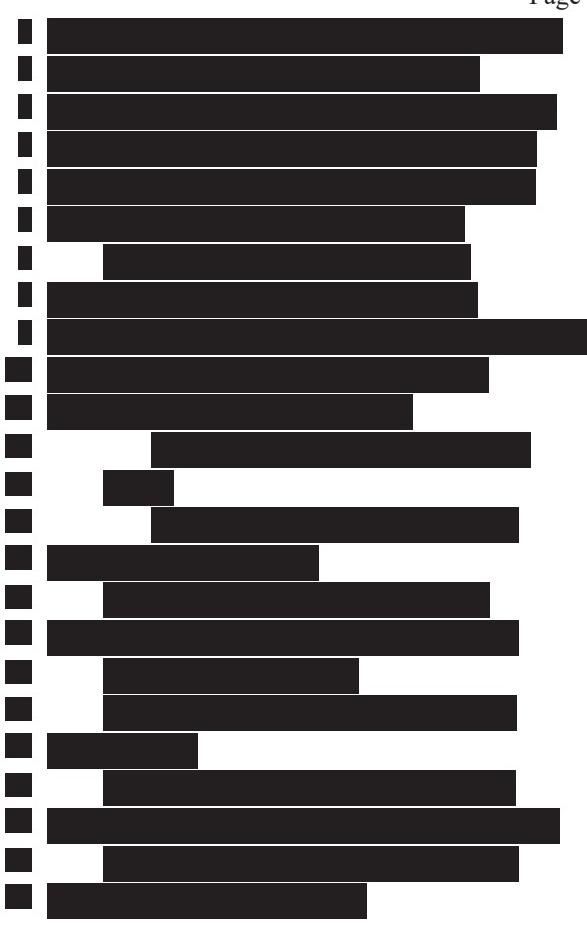
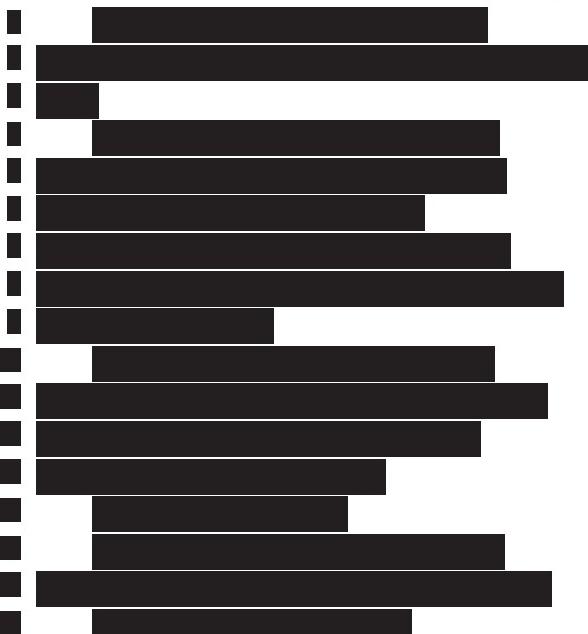
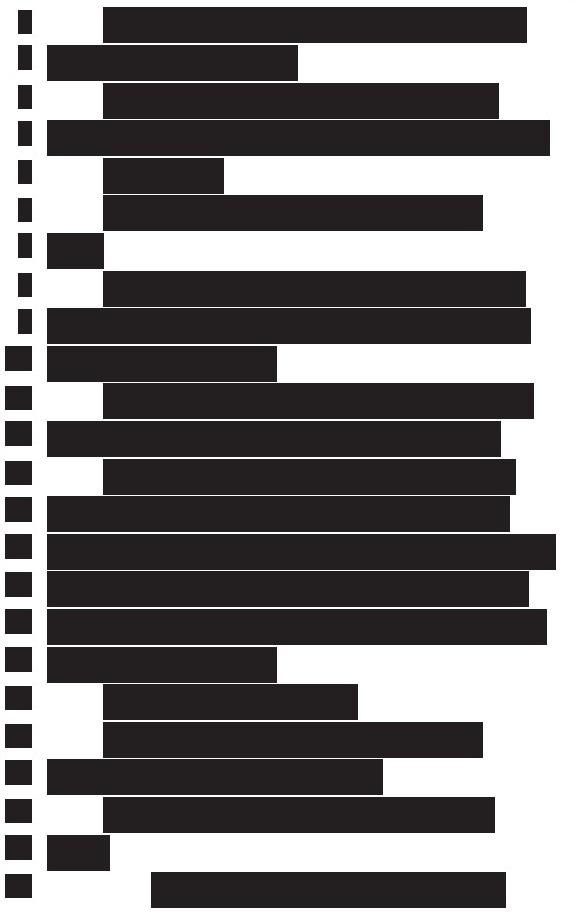
10 - - -
11 (Whereupon,
12 Rite Aid-Ringgold Exhibit-11,
13 Rite_Aid_OMDL_0003562, was marked
14 for identification.)

15 - - -

16 BY MR. LAVELLE:
17 Q. Mr. Ringgold, I'm going to
18 give you what we've marked for
19 identification as Ringgold-11.

20 Please take a look at it and
21 tell me when you've had a chance to
22 review it

23 It is Bates number
24 Rite Aid OMDL 0003562. Again, that's

<p style="text-align: center;">Page 114</p> 	<p style="text-align: center;">Page 116</p> 
<p style="text-align: center;">Page 115</p> 	<p style="text-align: center;">Page 117</p> 

18 Q. What do you have -- what did
19 you say in the next sentence of this
20 e-mail?

21 A. Shannon started the tote and
22 did go by the pick list order.

23 Q. And what does that mean?
24 A. We get an actual pick list

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Page 120

Term	Percentage (%)
Climate change	98
Global warming	95
Green energy	92
Sustainable development	88
Renewable energy	85
Eco-friendly	82
Carbon footprint	78
Green economy	75
Environmental protection	72
Climate justice	68
Green technology	65
Carbon tax	62
Green infrastructure	58
Green building	55
Green jobs	52
Green transportation	48
Green agriculture	45
Green products	42
Green living	38
Green lifestyle	35
Green space	32
Green economy	28
Green energy	25
Green technology	22
Green infrastructure	18
Green building	15
Green products	12
Green living	8
Green lifestyle	5
Green space	2

Term	Percentage (%)
Global warming	98
Green energy	95
Carbon footprint	92
Sustainable development	90
Renewable energy	88
Eco-friendly	85
Clean energy	82
Green technology	78
Environmental protection	75
Climate change	72
Green products	68
Energy efficiency	65
Recycling	62
Organic food	58
Bio-degradable	55
Green building	52
Green infrastructure	48
Green transportation	45
Green economy	42
Green jobs	38
Green investment	35
Green building	32
Green infrastructure	28
Green transportation	25
Green economy	22
Green jobs	18
Green investment	15

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Page 121

A horizontal bar chart illustrating the percentage of respondents who have heard of various environmental terms. The y-axis lists the terms, and the x-axis represents the percentage scale from 0% to 100%.

Term	Percentage (%)
Global warming	98
Green energy	95
Carbon footprint	92
Sustainable development	88
Renewable energy	85
Eco-friendly	82
Climate change	78
Green technology	75
Organic food	72
Recycling	68
Bio-degradable	65
Green building	62
Energy efficiency	58
Green products	55
Green infrastructure	52
Green economy	48
Green space	45
Green transportation	42
Green architecture	38
Green waste	35
Green infrastructure	32
Green energy	28
Green products	25
Green technology	22
Green building	18
Green infrastructure	15
Green economy	12
Green transportation	8
Green architecture	5
Green waste	2
Green infrastructure	1

A horizontal bar chart illustrating the percentage of respondents who have heard of various environmental terms. The y-axis lists the terms, and the x-axis represents the percentage scale from 0% to 100%.

Term	Percentage (%)
Global warming	92
Green energy	88
Sustainable development	85
Renewable energy	82
Clean energy	80
Carbon footprint	78
Eco-friendly	75
Green technology	72
Renewable resources	68
Sustainable living	65
Green products	62
Renewable power	58
Sustainable practices	55
Green infrastructure	52
Renewable energy sources	48
Sustainable energy	45
Green building	42
Renewable electricity	38
Sustainable architecture	35
Green design	32
Renewable fuel	28
Sustainable engineering	25
Green infrastructure	22
Renewable power	18
Sustainable living	15
Green products	12
Renewable resources	8
Sustainable development	5
Green energy	3
Global warming	1

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Page 124

A horizontal bar chart illustrating the percentage of respondents who have heard of various mental health terms. The y-axis lists the terms, and the x-axis represents the percentage from 0% to 100%.

Term	Percentage (%)
Depression	98
Anxiety	95
Obsessive Compulsive Disorder (OCD)	85
Post-Traumatic Stress Disorder (PTSD)	80
Generalized Anxiety Disorder (GAD)	75
Major Depressive Disorder (MDD)	70
Bipolar Disorder	65
Borderline Personality Disorder (BPD)	60
Schizophrenia	55
Attention Deficit Hyperactivity Disorder (ADHD)	50
Autism Spectrum Disorder (ASD)	45
Generalized Anxiety	40
Major Depressive	35
Obsessive Compulsive	30
Post Traumatic Stress	25
Borderline Personality	20
Schizophrenic	15
Autistic	10
Attention Deficit	5

A horizontal bar chart illustrating the percentage of patients with specific comorbidities across different age groups. The y-axis represents age groups, and the x-axis represents the percentage of patients. The comorbidities listed on the x-axis are: Hypertension, Diabetes, Coronary heart disease, Stroke, Chronic lung disease, Arthritis, and Kidney disease.

Age Group	Hypertension	Diabetes	Coronary heart disease	Stroke	Chronic lung disease	Arthritis	Kidney disease
18-24	10%	0%	0%	0%	0%	0%	0%
25-34	15%	0%	0%	0%	0%	0%	0%
35-44	20%	0%	0%	0%	0%	0%	0%
45-54	25%	0%	0%	0%	0%	0%	0%
55-64	30%	10%	0%	0%	0%	0%	0%
65-74	35%	15%	0%	0%	0%	0%	0%
75-84	40%	20%	0%	0%	0%	0%	0%
85+	45%	25%	0%	0%	0%	0%	0%
All ages	30%	15%	0%	0%	0%	0%	0%

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Page 125

Term	Percentage (%)
Climate change	98
Global warming	95
Green energy	92
Sustainable development	88
Renewable energy	85
Eco-friendly	82
Carbon footprint	78
Green economy	75
Environmental protection	72
Conservation	68
Green technology	65
Carbon tax	62
Green building	58
Green infrastructure	55
Green jobs	52
Green transportation	48
Green products	45
Green living	42
Green space	38
Green architecture	35
Green waste	32
Green energy source	28
Green energy source	25
Green energy source	22
Green energy source	18
Green energy source	15
Green energy source	12
Green energy source	8
Green energy source	5
Green energy source	2
Green energy source	1
Green energy source	0

Term	Percentage (%)
Depression	95
Anxiety	92
Obsessive Compulsive Disorder (OCD)	88
Post-Traumatic Stress Disorder (PTSD)	85
Generalized Anxiety Disorder (GAD)	82
Major Depressive Disorder (MDD)	80
Bipolar Disorder	78
Borderline Personality Disorder (BPD)	75
Schizophrenia	72
Attention Deficit Hyperactivity Disorder (ADHD)	68
Autism Spectrum Disorder (ASD)	65
Generalized Anxiety	62
Major Depression	58
Depression and Anxiety	55
Depression and Anxiety Disorders	52
Depression and Anxiety Disorders	50
Depression and Anxiety Disorders	48
Depression and Anxiety Disorders	45
Depression and Anxiety Disorders	42
Depression and Anxiety Disorders	40
Depression and Anxiety Disorders	38
Depression and Anxiety Disorders	35
Depression and Anxiety Disorders	32
Depression and Anxiety Disorders	30
Depression and Anxiety Disorders	28
Depression and Anxiety Disorders	25
Depression and Anxiety Disorders	22
Depression and Anxiety Disorders	20
Depression and Anxiety Disorders	18
Depression and Anxiety Disorders	15
Depression and Anxiety Disorders	12
Depression and Anxiety Disorders	10
Depression and Anxiety Disorders	8
Depression and Anxiety Disorders	5
Depression and Anxiety Disorders	3
Depression and Anxiety Disorders	1
Depression and Anxiety Disorders	0

[REDACTED]	Page 126
[REDACTED]	1 INSTRUCTIONS TO WITNESS
[REDACTED]	2
[REDACTED]	3 Please read your deposition
[REDACTED]	4 over carefully and make any necessary
[REDACTED]	5 corrections. You should state the reason
[REDACTED]	6 in the appropriate space on the errata
[REDACTED]	7 sheet for any corrections that are made.
[REDACTED]	8 After doing so, please sign
[REDACTED]	9 the errata sheet and date it.
[REDACTED]	10 You are signing same subject
[REDACTED]	11 to the changes you have noted on the
[REDACTED]	12 errata sheet, which will be attached to
[REDACTED]	13 your deposition.
[REDACTED]	14 It is imperative that you
[REDACTED]	15 return the original errata sheet to the
[REDACTED]	16 depoing attorney within thirty (30) days
[REDACTED]	17 of receipt of the deposition transcript
[REDACTED]	18 by you. If you fail to do so, the
[REDACTED]	19 deposition transcript may be deemed to be
[REDACTED]	20 accurate and may be used in court.
[REDACTED]	21
[REDACTED]	22
[REDACTED]	23
[REDACTED]	24
11 MR. LAVELLE: I have no 12 further questions. 13 MR. POWERS: I don't have 14 any follow-up. 15 VIDEO TECHNICIAN: The time 16 is now 7:11 p.m. This concludes 17 today's deposition. We're going 18 off the record. 19 - - - 20 (Whereupon, the deposition 21 concluded at 7:11 p.m.) 22 - - - 23 24	Page 127
1 CERTIFICATE 2 3 4 I HEREBY CERTIFY that the 5 witness was duly sworn by me and that the 6 deposition is a true record of the 7 testimony given by the witness. 8 9 10 Amanda Maslynsky-Miller 11 Certified Realtime Reporter 12 Dated: January 27, 2019 13 14 15 16 17 (The foregoing certification 18 of this transcript does not apply to any 19 reproduction of the same by any means, 20 unless under the direct control and/or 21 supervision of the certifying reporter.) 22 23 24	Page 129
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	1 ----- 2 E R R A T A 3 ----- 4 PAGE LINE CHANGE/REASON 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 _____ 22 _____ 23 _____ 24 _____

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ACKNOWLEDGMENT OF DEPONENT

I, _____, do
3 hereby certify that I have read the
foregoing pages, 1 - 126, and that the
4 same is a correct transcription of the
answers given by me to the questions
5 therein propounded, except for the
corrections or changes in form or
6 substance, if any, noted in the attached
Errata Sheet.

LARRY RINGGOLD DATE

Subscribed and sworn
to before me this
____ day of _____, 20 ____.

My commission expires:

Notary Public

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LAWYER'S NOTES

PAGE LINE